

Christine M. Tobin-Presser, WSBA #27628  
BUSH KORNFELD LLP  
601 UNION STREET, SUITE 5000  
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HONORABLE CHRISTOPHER M. ALSTON

HEARING DATE: June 4, 2025  
HEARING TIME: 9:30 a.m.  
LOCATION: Seattle, Courtroom 7206  
RESPONSE DUE: May 28, 2025

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON

In re

Chapter 7

CRAIG CLINTON ROMINGER and HEIDI KAY  
ROMINGER,

No. 24-11790-CMA

Debtors.

JONATHAN ROBERTS, an individual,

Adversary Case No. 24-01085-CMA

Plaintiff,

v.

DECLARATION OF CHRISTINE M.  
TOBIN-PRESSER RE: ATTORNEYS  
FEES AND COSTS RELATING TO  
RESPONDING TO DEFENDANTS'  
MOTION TO COMPEL DISCOVERY

CRAIG CLINTON ROMINGER and HEIDI KAY  
ROMINGER,

Defendants.

Christine M. Tobin-Presser declares as follows:

1. I am the attorney for Jonathan Roberts in the above-captioned adversary proceeding. I have personal knowledge of the facts set forth herein and I am competent to testify to the same.

2. Attached hereto as Exhibit A is a true copy of an invoice setting for the fees incurred by Bush Kornfeld LLP in responding to Defendants' Motion to Compel Discovery including one-half hour in estimated fees for the June 4, 2025 hearing.

3. I declare under penalty of perjury under the laws of the state of Washington that the foregoing information is true and correct.

DATED this 27<sup>th</sup> day of May, 2025.

/s/ Christine M. Tobin-Presser  
Christine M. Tobin-Presser

DECLARATION OF CHRISTINE M. TOBIN-PRESSER RE:  
ATTORNEYS FEES AND COSTS RELATING TO  
RESPONDING TO DEFENDANTS' MOTION TO COMPEL  
DISCOVERY— Page 1

BUSH KORNFELD LLP  
LAW OFFICES  
601 Union St., Suite 5000  
Seattle, Washington 98101-2373  
Telephone (206) 292-2110  
Facsimile (206) 292-2104

Declaration of Service

PAULA SUTTON declares:

4. I am an employee of Bush Kornfeld LLP. I am a citizen of the United States, over the age of 18, and competent to make this declaration.

5. On the 27<sup>th</sup> day of May, 2025, I caused copies of the foregoing *Declaration of Christine M. Tobin-Presser Re: Attorneys Fees and Costs Relating to Responding to Defendants' Motion to Compel Discovery* to be emailed and mailed, U.S. First-Class mail, postage prepaid, to:

Craig Clinton Rominger  
7517 150th St. SE  
Snohomish, WA 98296

Email: [craig.romginer@gmail.com](mailto:craig.romginer@gmail.com)

and

Heidi Kay Rominger  
7517 150th St. SE  
Snohomish, WA 98296

Email: [Heidi.rominger@gmail.com](mailto:Heidi.rominger@gmail.com)

I declare under penalty of perjury under the laws of the state of Washington that the foregoing information is true and correct.

DATED this 27<sup>th</sup> day of May, 2025, at Seattle, Washington.

/s/ Paula Sutton  
PAULA SUTTON

# **EXHIBIT A**

**Bush Kornfeld LLP**  
601 Union St., Suite 5000  
Seattle, WA 98101-2373

Phone (206) 292-2110; Fax 292-2104  
Federal Tax I.D. #91-1560644

JONATHAN ROBERTS  
[via email]

May 27, 2025  
Invoice # 25345

In Reference To: OUR CLIENT MATTER NO: 2615-20221  
Advice

**TOTAL PROFESSIONAL FEES AND EXPENSES PER DETAIL BELOW** \$4,200.00

Professional services

			<u>Hours</u>	<u>Amount</u>
<u>DISCOVERY</u>				
5/2/2025	CMT	Email correspondence with C. Rominger regarding proposed discovery conference.	0.20	100.00
5/5/2025	CMT	Review discovery motion and inquire as to hearing date.	0.20	100.00
5/6/2025	CMT	Telephone conference with J. Roberts and work on Reponse to Motion to Compel Discovery.	2.50	1,250.00
5/7/2025	CMT	Work on response to motion to compel discovery.	2.80	1,400.00
5/13/2025	CMT	Work on response to motion to compel.	0.50	250.00
	CMT	Work on response to discovery motion.	0.50	250.00
5/19/2025	CMT	Review discovery pleadings and prepare argument.	0.60	300.00
5/20/2025	CMT	Email correspondence with P. Sutton re: Errata to C. Tobin-Presser declaration re: Motion to Compel.	0.40	200.00
5/21/2025	CMT	Prepare for and attending hearing on discovery.	0.70	350.00

	<u>Hours</u>	<u>Amount</u>
	<u>          </u>	<u>          </u>
SUBTOTAL:	[ 8.40	4,200.00]
For professional services rendered		<u>\$4,200.00</u>
<b>Balance due</b>		<u><b>\$4,200.00</b></u>